

REMARKS

Claim Rejections

Claims 1-3 and 5-8 stand rejected under 35 U.S.C. 103(a) as unpatentable over U.S. Patent No. 6,682,423 (Brosnan et al.) and U.S. Patent Pub. No. 2001/0041612 A1 (Garahi et al.). Claim 4 stands rejected under 35 U.S.C. 103(a) as unpatentable over Brosnan et al., Garahi et al. and U.S. Patent No. 5,876,284 (Acres et al.). Claim 9 stands rejected under 35 U.S.C. 103(a) as unpatentable over Brosnan et al., Garahi et al. and U.S. Patent No. 6,110,044 (Stern).

Claim Amendments

Claims 1 and 5 are amended to further patentably distinguish over Bronson et al. and Garahi et al. Support for these amendments may be found, for example, in Applicants' specification at page 7, lines 9-12, and page 15, line 21 to page 16, line 3.

The Cited Art

Brosnan et al. discloses a gaming machine network 50. The network 50 includes a community of gaming machines 2, servers 71-74, communication interfaces 52, and a network 60. The network 60 provides digital communication between all the nodes in the network 50. (Col. 6, lines 14-21). The servers 71-74 each provide a separate gaming service for the gaming machines. (Col. 6, lines 37-44).

The gaming machines 2a-2c communicate with the network 60 through communication interfaces 52a-52c. (Col. 7, lines 4-14). A gaming machine interface is located in a gaming machine top box 209 or on a main communication board 210 within a gaming machine cabinet. Alternatively, a gaming machine interface may be mounted to the side of a gaming machine cabinet. (Col. 14, lines 6-15; FIG. 1B).

The servers 71-74 communicate with the network 60 via communication interfaces 52d-52g. The communication interfaces 52d-52g provide data transmission and communication protocol translation services for the servers 71-74. (Col. 6, lines 47-50). Each server may use a different proprietary communication protocol, remote computer, and proprietary network hardware and connection scheme to communicate game information within the gaming machine network 50. A communication interface for each server is then responsible for providing data transmission services for each server onto the common protocol and hardware used on the network 60. (Col. 6, lines 54-61).

The gaming machines and the servers are connected to their respective communication interfaces by a wired game service connection 54. (Col 7, lines 4-6; Col. 8, lines 57-60; Col. 9, lines 19-23; FIG. 1A). The communication interfaces 52a-52c for the gaming machines are connected to the network 60 by network lines 57. The network lines may use a wired, wireless or combination connection scheme. (Col. 10, lines 2-6; col. 16, lines 55-61; FIG. 1A). The communication interfaces 52d-52g for the servers are in communication with the network 60 via an appropriate communication protocol. (Col. 6, lines 58-66).

Garahi et al. discloses a wagering data hub 12 suitable for use with an interactive wagering system 10. The hub 12 includes a data distribution system 100, a data interface 102, a database 104 and a wireless server 116. (§0042). The hub 12 controls the wagering system 10. The hub 12 is coupled to a television set-top box 14, a user computer 16, a wireless device 18 and a telephone 20. (§0029).

Applicants' Claimed Invention Would Not Have Been Obvious

Three criteria must be met to establish obviousness. First, the prior art must provide one of ordinary skill in the art with a suggestion or motivation to modify or combine the teachings of the references relied upon in rejecting the claims. Second, the prior art must provide one of ordinary skill in the art with a reasonable expectation of success. Third, the prior art, either alone or in combination, must teach or suggest each and every limitation of the rejected claims. The teaching or suggestion to make the claimed invention, as well as the reasonable expectation of success, must come from the prior art and not from Applicants' disclosure. If any one of these criteria is not met, a case of obviousness is not established. Also, some articulated reasoning with rational underpinnings must be provided to support a *prima facie* case of obviousness.

It is respectfully submitted that claims 1-9 would not have been obvious in view of Brosnan et al. and Garahi et al.

Claim 1 is directed to a gaming network including a plurality secure wireless servers structured to couple to one or more information servers. The secure wireless servers are located in an area in which gaming machines are available for play. The gaming network further includes a portable secure wireless receiver structured to couple via a wireless link to at least one of the secure wireless servers and to create a secure data channel between that secure wireless server and the secure wireless receiver.

Claim 5 calls for a system for redeeming tickets. The system includes a plurality of secure wireless servers structured to couple to one or more information servers. The secure wireless servers are distributed around a gaming floor in which at least one gaming machine is

located. The system further includes a portable secure wireless receiver, other than the one or more information servers, structured to couple via a wireless link to at least one of the secure wireless servers and create a secure data channel between the at least one secure wireless server and the secure wireless receiver.

It was said in the Office Action that the communication interfaces 52a-52c for the gaming machines 2a-2c correspond to secure wireless receivers. (Office Action of April 24, 2008, ¶4). However, the amended claims specify that the secure wireless receiver is a portable device. There is no disclosure in Brosnan et al. that the communication interfaces 52a-52c are portable. In fact, the interfaces 52a-52c are clearly not portable, as they are either mounted to a gaming machine, or located inside the cabinet or top box of a gaming machine. (Col. 14, lines 6-15; FIG. 1B).

Further, Brosnan et al. discloses that the network lines 57a-57c between the communication interfaces 52a-52c for the gaming machines 2a-2c may use a wireless scheme to connect to the network 60. The servers 71-74 of Brosnan et al. are also connected to the network 60 by the communication interfaces 52d-52g. The communication interfaces 52d-52g are connected to the servers 71-74 by the wired gamed service connection 54. (Col. 7, lines 4-6; Col. 8, lines 57-60; Col. 9, lines 19-23; FIG. 1A). The communication interfaces 52d-52g are, in turn, connected to the network 60 via an appropriate communication protocol. (Col. 6, lines 58-66). There is absolutely no disclosure that the interfaces 52d-52g are wirelessly connected to the network 60.

Nonetheless, in the Office Action, it was said that the communication interfaces 52d-52g are secure wireless devices. (Office Action of April 24, 2008, ¶4). However, as is clear from Brosnan et al., the communication interfaces 52d-52g are coupled to the servers 71-74 by the wired connection 54, and there is no disclosure that these interfaces are wirelessly connected to the network 60. Thus, there is no disclosure that these communications interfaces 52d-52g are wireless devices.

Also, as admitted in the Office Action, the communication interfaces 52d-52g are not servers. Rather, they provide data transmission services and hardware connectivity for each of the servers 71-74. (Col. 6, line 58 to Col. 7, line 3).

In an effort to convert the wired communication interfaces 52d-52g into wireless servers, the disclosure of Garahi et al. is relied upon. However, Garahi et al. simply discloses that the wagering data hub 12 includes the wireless server 116. (¶0042). That server, at most, corresponds to one of the servers 71-74 of Brosnan et al. As such, the combination of Brosnan et al. and Garahi et al. would not have resulted in Applicants' claimed invention.

Moreover, the communication interfaces 52d-52g of Brosnan et al. are not located in an area of a casino, for example, in which gaming machines are available for play. Instead, the communication interfaces are located on the network 60 at a location remote from the gaming machines. (Col. 6, lines 47-61).

Similarly, the wireless server 116 of Garahi et al. is also located remotely from the gaming area or racetrack 42. Indeed, video images of a race are beamed by a satellite 44 to the data hub 12 which includes the wireless server 116. (¶0034; FIG. 1).

Further, no reference has been cited to establish that secure communications within the context of Applicants' claimed invention would have been obvious. (Office Action of April 24, 2008, ¶4). Also, no support has been provided from the argument that the "use of multiple servers. . . [and] the server . . . in the gaming area . . ." is well known. (Office Action of April 24, 2008, ¶4). Suitable evidence to establish a prima facie case of obviousness, if available, must be provided. MPEP § 2144.03.

Thus, for at least these reasons, claims 1-9 would not have been obvious in view of Brosnan et al. and Garahi et al., either alone or in combination with other references.

Conclusion

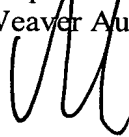
In view of the foregoing, it is respectfully submitted that all the claims are now in condition for allowance. Accordingly, allowance of the claims at the earliest possible date is requested.

If prosecution of this application can be assisted by telephone, the Examiner is requested to call Applicants' undersigned attorney at (510) 663-1100.

If any fees are due in connection with the filing of this amendment (including any fees due for an extension of time), such fees may be charged to Deposit Account No. 504480 (Order No. IGT1P304).

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Respectfully submitted,
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